

EXHIBIT C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----:
RICHARD KADREY, et al., :
Individual and :
Representative Plaintiffs, :
vs. : Case No.:
META PLATFORMS, INC., : 3:23-cv-03417-VC
a Delaware corporation; :
Defendant. :
-----:

VIDEOTAPED DEPOSITION OF MATTHEW C. KLAM
Cleary Gottlieb Steen & Hamilton, LLP
Tuesday, December 10, 2024
9:40 a.m.

Reported by:
Robert M. Jakupciak, RPR
JOB No. SF-7030273

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1 You mean direct quotes? 10:13:43

2 Q. Yes. 10:13:45

3 A. No. 10:13:45

4 Q. Let me ask the question again so we 10:13:46

5 can get a clear record. 10:13:47

6 A. Yeah. 10:13:49

7 Q. Are you aware of any instance in 10:13:49

8 which any Meta AI tool has output verbatim text 10:13:52

9 from any of your works? 10:13:58

10 A. No. I got an answer when I asked 10:13:59

11 for it to reproduce and it said that that would 10:14:03

12 be a copyright infringement. 10:14:07

13 Q. Okay. So you also prompted Meta AI 10:14:09

14 in particular to output texts from your work? 10:14:14

15 A. I think yeah. I think I did. 10:14:20

16 Q. And it refused to do that? 10:14:22

17 A. Uh-huh. 10:14:24

18 Q. Sorry. Is that a yes? 10:14:25

19 A. Yeah. Sorry. Drinking water. 10:14:27

20 Q. What do you want out of this 10:14:42

21 lawsuit? 10:14:45

22 MR. RATHUR: Objection to form. 10:14:46

REPORTER'S CERTIFICATE

I, ROBERT M. JAKUPCIAK, an RPR and
Notary Public within and for the District of
Columbia do hereby certify:

That the witness whose deposition is
hereinbefore set forth, was duly sworn and that
the within transcript is a true record of the
testimony given by such witness.

I further certify that I am not
related to any of these parties to this action
by blood or marriage and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 20th day of December, 2024.



ROBERT M. JAKUPCIAK, an RPR and
Notary Public

My Commission Expires:
February 28, 2029